# The Luzerne Legal Register

Established 1872

(Cite Vol. 112 Luz. Reg. Reports)

VOL. 112 Wilkes-Barre, PA, Friday, February 18, 2022

No. 7

POSTMASTER: Send address changes to THE LUZERNE LEGAL REGISTER, 200 N. River Street, Room 23, Wilkes-Barre, PA 18711-1001 Periodical postage paid at Wilkes-Barre, PA and additional office.

# Price \$100. Per Year

Single Copies \$2.00

Bar News Must Be Received by 12 O'Clock Noon, Friday for the Following Week of Publication. Legal Notices and Ads Must Be Received by 12 O'Clock Noon, Monday in the Week of Publication.



(USPS 322-840)
PUBLISHED WEEKLY BY
The Wilkes-Barre Law and Library Association

Back Issues of *The Luzerne Legal Register* are posted on the Bar website at **Luzernecountybar.com** and may be viewed and/or downloaded.

Legal Ads published in this issue may be electronically searched online at **www.palegalads.org**.

"JB" Joseph Paul Justice Burke, III Reporter of Decisions of the Court of Common Pleas and Editor-in-Chief

Kristin R. Shimonis
Editor
Commercial Advertising,
Legal Notices and Bar News

Gail Kopiak Bar Website Editor

Tel. 570-822-6712 Fax 570-822-8210 WEBSITE ADDRESS: www.luzernecountybar.com

All legal notices must be submitted in typewritten form and are published exactly as submitted by the advertiser. Neither *The Luzerne Legal Register* nor the printer (Clare Printing) will assume any responsibility to edit, make spelling corrections, eliminate errors in grammar, or make changes to content.

Notice is hereby given to all persons concerned that accountants in the following estates have filed their accounts in the Office of the Register of Wills and Clerk of the Orphans' Court of Luzerne County and unless objections are filed thereto, said accounts will be audited and confirmed by the Orphans' Court Division of the Court of Common Pleas of Luzerne County at 9:30 A.M. on March 1, 2022 at the Luzerne County Courthouse, 200 North River St., Wilkes-Barre, PA.

NO.	NAME OF ESTATE	ACCOUNTANT	FIDUCIARY CAPACITY
1.	Russell G. Miller	Carol Humphrey	Executrix
2.	Pega Real Estate Trust	Marianne Cameli Eugene Cameli	Trustees

The Luzerne County Orphans' Court, located at the Luzerne County Courthouse, 200 North River St., Wilkes-Barre, PA is a facility accessible to persons with disabilities. Please notify a member of the staff of the Honorable Tara C. Toohil, Judge at (570) 830-5122 if special accommodations are required.

# NOTICE

It is strongly recommended that all attorneys having a matter on an Audit List of the Orphans' Court be present at the call of the Audit List. Any attorney seeking to be excused from attending the call of the Audit List must contact the staff in Judge Toohil's Chambers in advance of the call date in order to obtain permission from the Judge to be absent.

Feb. 11, 18

# DECEDENTS' ESTATES

Notice is hereby given that letters testamentary or of administration have been granted in the following estates. All persons indebted to said estates are required to make payment and those having claims or demands to present the same without delay to the administrators or executors named or their attorneys

#### FIRST PUBLICATION

- ESTATE OF ROSALIE BAGENSKI, late of Wilkes-Barre (died November 24, 2021), Daria Ewanik, Executrix; Chad J. Sweigart, Esquire, Dyller & Solomon, 88 North Franklin St., Wilkes-Barre, PA 18701
- ESTATE OF JAMES R. BARAN, late of West Hazleton (died October 20, 2021), Stephanie D. Baran, Executrix; Rosenn, Jenkins & Greenwald, LLP, 1065 Hwy. 315, Suite 200, Wilkes-Barre, PA 18701
- ESTATE OF JOSEPH WILLIAM BONE, late of Exeter (died December 25, 2021), David Bone, 12269 N. 51st St., Philadelphia, PA 19131, Executor
- ESTATE OF LEAH J. BRADY, late of Pittston Twp. (died November 26, 2021), Sharon Serino, Executrix; Kelley, Polishan & Solfanelli, LLC, 259 S. Keyser Ave., Old Forge, PA 18518
- ESTATE OF ROBERT E. FALLETTA, late of Luzerne (died November 19, 2020), Jo Anne Falletta, Administratrix; Paul M. Pugliese, Esquire, Pugliese, Finnegan, Shaffer & Ferentino LLC, 575 Pierce St., Suite 500, Kingston, PA 18704
- ESTATE OF KATHLEEN MARIE FED-DER, late of Nescopeck (died December 16, 2021), Kara Marie

- Thompson, Administratrix; Rebecca S. Reimiller, Esquire, Dickson, Gordner and Hess, 128 West Second St., Berwick, PA 18603
- ESTATE OF JOSEPH T. FERACK a/k/a Joseph Ferack, late of Avoca (died December 22, 2021), Deborah Ferack, Executrix; Saporito, Falcone & Watt, 48 South Main St., Pittston, PA 18640
- ESTATE OF JOHN HABER, late of Hazleton (died December 18, 2021), John Joseph Haber, D.O. a/k/a John Haber, Executor; Conrad A. Falvello, Esquire, The Falvello Law Firm, P.C., 641 State Route 93, Sugarloaf, PA 18249
- ESTATE OF HENRY T. LEVI, late of Nanticoke (died December 5, 2021), Cathy A. Levi, Executrix; Hourigan, Kluger & Quinn, P.C., 600 Third Ave., Kingston, PA 18704
- ESTATE OF CLAYTON L. TRAVER a/k/a Clayton Traver a/k/a Clayton Leroy Traver, late of Lake Twp. (died March 20, 2015), Irene Traver, Administratrix; Kathleen B. Murren, Esquire, Skarlatos Zonarich, 320 Market St., Ste. 600W, Harrisburg, PA 17101
- ESTATE OF JOYCE E. TRIVELPIECE, late of Berwick (died January 5, 2022), Jill E. Jaffin, Executrix; Brenda R. Hess, Esquire, Dickson, Gordner and Hess, 128 West Second St., Berwick, PA 18603

#### SECOND PUBLICATION

- ESTATE OF NORINE M. AMESBURY, late of Wilkes-Barre (died December 21, 2021), William Amesbury, Administrator; Bregman & Lantz, LLC, 1205 Wyoming Ave., Forty Fort, PA 18704
- ESTATE OF JOHN ANDREFSKY a/k/a John R. Andrefsky, late of Hazleton (died November 26,

# THE LUZERNE LEGAL REGISTER

- 2021), John C. Andrefsky and Desiree Andrefsky, Co-Executors; Stacey Acri, Esquire, 273 E. Northampton St., Wilkes-Barre, PA 18702
- ESTATE OF REGINA A. BRANDT a/k/a Regina Brandt, late of Plains Twp. (died December 10, 2021), Barbara Attardo, Executrix; John J. Terrana, Esquire, 400 Third Ave., Suite 216, Kingston, PA 18704
- ESTATE OF TYLER JOSEPH COW-MAN, late of Bear Creek Village (died April 24, 2021), Shawn Cowman and Diane Cowman, Administrators; Alexander B. Russin, Esquire, 1516 Wyoming Ave., Forty Fort, PA 18704
- ESTATE OF BEVERLY M. DONAHUE, late of Butler Twp. (died December 16, 2021), Denise R. Chrisman a/k/a Denise D. Chrisman, Executrix; Danielle Friedman, Esquire, Offit Kurman, P.A., 1801 Market St., #2300, Philadelphia, PA 19103
- ESTATE OF ROBERTA GITTELMAN a/k/a Roberta A. Gittelman a/k/a Bobbi Gittelman, late of Hazle Twp. (died October 28, 2021), Eric Major Gittelman, Executor; Peter O'Donnell, Esquire, 305 Church St., Suite 175, Hazleton, PA 18201
- ESTATE OF JEANNE HANDMAN, late of Wilkes-Barre Twp. (died November 8, 2021), Carl J. Handman, Administrator; Rosenn, Jenkins & Greenwald, LLP, 15 South Franklin St., Wilkes-Barre, PA 18711-0075
- ESTATE OF JOYCE HOCKO, late of Wright Twp. (died December 19, 2021), Laura Lenio, Executrix; Richard C. Shiptoski, Esquire, 1217 Wyoming Ave., Forty Fort, PA 18704

- ESTATE OF DENNIS J. HOLLING, late of Hazle Twp. (died January 3, 2022), Joseph Halcisak, Executor; Frank J. Skokoski, Esquire, Skokoski & DeCosmo, 165 Susquehanna Blvd., West Hazleton, PA 18202
- ESTATE OF KENNETH P. HUNTER a/k/a Kenneth Hunter, late of Wilkes-Barre (died April 19, 2015), Carl F. Hunter, Administrator; William J. Schneider, Esquire and James A. Schneider, Esquire, 439 West Broad St., Hazleton, PA 18201-6106
- ESTATE OF JOHN JANICK, late of Exeter, Nichole Malinovitch, Administratrix; Jane Smedley Anzalone, Esquire, Anzalone Law Offices, LLC, 98 South Franklin St., Wilkes-Barre, PA 18702
- ESTATE OF RICHARD P. KARPO-WICH, late of Butler Twp. (died November 21, 2021), Kristen R. Holloway, Executrix; Lorine Angelo Ogurkis, Esquire, Ogurkis Law, LLC, 21 North Locust St., Hazleton, PA 18201
- ESTATE OF MARK G. KATCHMARIK, late of Hazleton (died December 21, 2021), Deborah Lee Katchmarik, Executrix; James V. Senape, Jr., Esquire, Catherine A. McGovern, Esquire and Michael B. Senape, Esquire, Senape & Associates, 612-614 Main St., P.O. Box 179, Freeland, PA 18224-0179
- ESTATE OF OSCAR P. KEPHART, late of Fairview Twp. (died October 11, 2021), Carol Kephart, Administratrix; Bregman & Lantz, LLC, 1205 Wyoming Ave., Forty Fort, PA 18704
- ESTATE OF JOHN A. LETTIERE, JR., late of Hazleton (died November 20, 2021), Eugene J. Lettiere,

# THE LUZERNE LEGAL REGISTER

- Administrator; Eric M. Mika, Esquire, Toole, Mika & Jones, LLC, 26 East Centre St., Shenandoah, PA 17976
- ESTATE OF JOHN MIZENKO, late of Luzerne (died October 26, 2008), Thomas Jay Thorne, Administrator; Bregman & Lantz, LLC, 1205 Wyoming Ave., Forty Fort, PA 18704
- ESTATE OF DONNA PETROSKI, late of Wyoming (died January 4, 2022), Michael Petroski, Executor; Hourigan, Kluger & Quinn, PC, 600 Third Avenue, Kingston, PA 18704
- ESTATE OF JOHN FRANK RODRI-GUEZ a/k/a John F. Rodriguez, late of Freeland (died January 8, 2022), Kassie L. Rodriguez, Administratrix; David W. Saba, Esquire, 345 Market St., Kingston, PA 18704
- ESTATE OF ROBERT WILLIAM ROSENGRANT, late of Sugarloaf Twp. (died January 11, 2021), Derek Rosengrant and Cory Rosengrant, Co-Administrators; Law Office of Thomas A. O'Connor, P.C., 601 Wyoming Ave., Kingston, PA 18704
- ESTATE OF RENA M. ROTHSCHILD a/k/a Rena Iris Rothschild, late of Harveys Lake (died October 8, 2021), John A. Rothschild, Executor; Robert Freedenberg, Esquire, Skarlatos Zonarich, 320 Market St., Suite 600 W., Harrisburg, PA 17101
- ESTATE OF DAVID J. SWANKOSKY, late of Foster Twp. (died October 15, 2021), Kimberly A. Muller, Executrix; James V. Senape, Jr., Esquire, Catherine A. McGovern, Esquire and Michael B. Senape, Esquire, Senape & Associates, 612-614 Main St., P.O. Box 179, Freeland, PA 18224-0179

- ESTATE OF EMILIA M. THORNE a/k/a Emilia Thorne, late of Luzerne (died September 3, 2021), Thomas Jay Thorne, Executor; Bregman & Lantz, LLC, 1205 Wyoming Ave., Forty Fort, PA 18704
- ESTATE OF VIVIAN R. WICKISER, late of Sugar Notch (died December 30, 2021), Wilson W. Wickiser, Jr., Executor; Jannell L. Dudick, Esquire, 1043 Wyoming Ave., Forty Fort, PA 18704
- ESTATE OF MATTHEW J. WILCZYN-SKI, late of Nanticoke (died December 26, 2021), Marlene A. Cannon, Executrix; Jonathan A. Spohrer, Esquire, 279 Pierce St., Kingston, PA 18704
- ESTATE OF GEORGE MARSHAL WILSON, JR., late of Larksville (died September 28, 2021), Lucia Marie Wilson, Administratrix; Kristen L. Behrens, Esquire, Dilworth Paxson LLP, 457 Haddonfield Rd., Suite 700, Cherry Hill, NJ 08002
- ESTATE OF ELEANOR RITA WRO-BLEWSKI a/k/a Eleanor R. Wroblewski, late of Nanticoke (died December 11, 2021), James Wroblewski, 109 Espy St., Nanticoke, PA 18634, Executor
- ESTATE OF STANLEY YANIK, late of West Pittston (died October 30, 2020), Paul Strok, Administrator; James T. Mulligan, Esquire, 3703 Birney Ave., Moosic, PA 18507
- ESTATE OF ANDREW J. ZUNSKI, JR. a/k/a Andrew J. Zunski a/k/a Andy Zunski, late of Jenkins Twp. (died November 23, 2021), Gwen Bodnar, Administratrix; Charles A. DeCosmo, Esquire, Skokoski & DeCosmo, P.C., 165 Susquehanna Blvd., West Hazleton, PA 18202

# THIRD PUBLICATION

- ESTATE OF JAMES J. ALBERT a/k/a James John Albert, late of Forty Fort (died October 26, 2021), James W. Albert and Jane McCue, Co-Executors; Bregman & Lantz, LLC, 1205 Wyoming Ave., Forty Fort, PA 18704
- ESTATE OF NELLIE ALDRICH, late of Avoca (died August 25, 2021), George F. Aldrich, Executor; Harry T. Coleman, Esquire, 41 N. Main St., Carbondale, PA 18407
- ESTATE OF JUANITA AUMICK, late of Plymouth (died December 31, 2021), David Aumick and Theresa Ehrhart a/k/a Theresa Erhart, Executors; Hourigan, Kluger & Quinn, PC, 600 Third Avenue, Kingston, PA 18704
- ESTATE OF EUGENE DEININGER, late of Wilkes-Barre (died December 18, 2021), Holly M. LaFontaine, Executrix; Robert A. Anders, Esquire, 1170 Highway 315, Suite 2, Plains, PA 18702
- ESTATE OF ROSEMARY JAMES, late of Hazleton (died December 21, 2021), Dennis James and Janet A. Beam, Co-Executors; Peter O'Donnell, Esquire, 305 South Church St., Suite 175, Hazleton, PA 18201
- ESTATE OF MARIE M. LEWIS, late of Dallas Twp. (died January 3, 2022), Patricia J. Lewis, Administratrix; Jonathan A. Spohrer, Esquire, 279 Pierce St., Kingston, PA 18704
- ESTATE OF IRENE M. LUKSH, late of Plains Twp. (died July 21, 2020), Robert J. Luksh, Executor; Stephen J. Fendler, Esquire, Fendler & Associates, P.C., The Park Bldg., 400 Third Ave., Suite 309, Kingston, PA 18704

- ESTATE OF SALVADOR MARTINEZ, late of Hazleton (died April 25, 2020), Altagracia Narcisa Martinez, Administratrix; Donald G. Karpowich, Esquire, 85 Drasher Rd., Drums, PA 18222
- ESTATE OF LORRAINE MUNDIE a/k/a Lorraine M. Mundie, late of White Haven (died May 2, 2021), Kerrie L. Gelezinsky, Executrix; Joseph R. Baranko, Esquire, Slusser Law Firm, 1620 North Church St., Suite 1, Hazleton, PA 18202
- ESTATE OF ANN C. NOONE, late of Pittston (died December 31, 2021), William F. Noone, Executor; Hourigan, Kluger & Quinn, PC, 600 Third Avenue, Kingston, PA 18704
- ESTATE OF PADMINI RAJAGOPAL, late of Wilkes-Barre (died December 24, 2020), Susan M. Bettinger, Administratrix; Ronald L. Finck, Esquire, Mette, Evans and Woodside, 3401 N. Front St., Harrisburg, PA 17110
- ESTATE OF LILLIAN ROYAL (died November 23, 2021), Barbara Miller and Elizabeth Royal, Executrices; Catherine R. O'Donnell, Esquire, O'Donnell Law Office, 267 Wyoming Ave., Kingston, PA 18704
- ESTATE OF LEONARD M. SHE-NOSKY a/k/a Leonard Shenosky, late of Hazleton (died October 11, 2021), Kenneth Taylor, Administrator; Charles A. DeCosmo, Esquire, Skokoski & DeCosmo, P.C., 165 Susquehanna Blvd., West Hazleton, PA 18202
- ESTATE OF FRED L. SPENCER a/k/a Frederick L. Spencer a/k/a Frederick Spencer, late of Nanticoke (died July 23, 2021), Ruby Fulkersin, Administratrix; Hourigan, Kluger & Quinn, PC, 600 Third Avenue, Kingston, PA 18704

# THE LUZERNE LEGAL REGISTER

ESTATE OF JOHN TYLUTKE, late of Avoca (died December 17, 2021), Paul Tylutke, Executor; Anthony G. Ross, Esquire, Law Offices of Tony Ross, 126 South Main St., Pittston, PA 18640

ESTATE OF KATHERINE VEROSTEK, late of Wilkes-Barre (died June 23, 2021), Kathy Capobianco, Executrix; Law Offices of Bernard Walter, 1674 Memorial Hwy., Shavertown, PA 18708

ESTATE OF PHYLLIS WARAKOMSKI, late of Hanover Twp. (died October 27, 2021), Joseph Warakomski, Executor; Patrick J. Aregood, Esquire, 1218 South Main St., Hanover Twp., PA 18706

# TRUST NOTICE

NOTICE IS HEREBY GIVEN of the administration of the Elizabeth Reese Trust dtd. 3/5/99. Elizabeth Reese, Settlor, late of Wilkes-Barre, Luzerne Cty., PA died 1/10/22. All persons having claims against the decedent are requested to make known the same and all persons indebted to the decedent are required to make payment without delay to William Reese, Jr., Trustee c/o Christopher Wolf, Esq., 166 Allendale Road, King of Prussia, PA 19406.

Feb. 11, 18, 25

### NOTICE

Lawyers or legal office staff who may have prepared or assisted in the creation of a will or estate plan for Rita Ann Katulka, Plains, PA, who passed on January 31, 2022. Rita Ann Katulka is my aunt. I am looking for information on her will and can be reached at (570) 3014078 or e-mail rakat5581@gmail. com.

Feb. 18, 25

# NOTICE

NOTICE IS HEREBY GIVEN. that a Certificate of Organization

DUVALL LEATHERWORK LLC was filed with and approved by the Department of State of the Commonwealth of Pennsylvania on January 1, 2022 for the purpose of forming a Limited Liability Company pursuant the provisions of the Pennsylvania Limited Liability Company Law of 1994, as amended and/or supplemented.

ANGELA F. STEVENS, **ESQUIRE** 400 Third Avenue Suite 101 Kingston, PA 18704

Feb. 18

#### NOTICE

COURT OF COMMON PLEAS CIVIL DIVISION LUZERNE COUNTY

NO.: 2021-11213

Longbridge Financial, LLC **PLAINTIFF** 

vs.

Unknown Heirs, Successors, Assigns and All Persons, Firms or Associations Claiming Right, Title or Interest from or under Leonard R. Michalski, deceased: Gretchen Michalski. known heir of Leonard R. Michalski, deceased; and Lenn Michalski, known heir of Leonard R. Michalski, deceased **DEFENDANTS**  To: the Defendants, Unknown Heirs, Successors, Assigns and All Persons, Firms or Associations Claiming Right, Title or Interest from or under Leonard R. Michalski, deceased

TAKE NOTICE THAT THE Plaintiff, Longbridge Financial, LLC has filed an action Mortgage Foreclosure, as captioned above.

NOTICE

If you wish to defend, you must enter a written appearance personally or by attorney and file your defense or objections with the court. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you without further notice for the relief requested by the plaintiff. You may lose money or property

YOU SHOULD TAKE THIS NOTICE TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELE-PHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

or other rights important to you.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Luzerne County Lawyer
Referral Service
North Penn Legal Services, Inc.
33 N. Main Street
Ste. 200
Pittston, PA 18640

CHRISTOPHER A. DeNARDO, ESQUIRE PA I.D. No. 78447 KRISTEN D. LITTLE, **ESQUIRE** PA I.D. No. 79992 ELIZABETH L. WASSALL. **ESQUIRE** PA I.D. No. 77788 LESLIE J. RASE, ESQUIRE PA I.D. No. 58365 SAMANTHA GABLE. **ESQUIRE** PA I.D. No. 320695 LILY CALKINS, ESQUIRE PA I.D. No. 327356 HEATHER RILOFF, **ESQUIRE** PA I.D. No. 309906 LOGS LEGAL GROUP LLP 3600 Horizon Drive Suite 150 King of Prussia, PA 19406 Telephone: (610) 278-6800 E-mail: pahelp@logs.com Feb. 18

# FICTITIOUS NAME NOTICE

NOTICE IS HEREBY GIVEN that GLB Industries, LLC, filed with the Commonwealth of Pennsylvania on February 8, 2022, an application for fictitious name:

# SWEET SEEDLINGS PHOTOGRAPHY

The principal place of business is located at: 1260 Twin Stacks Drive, Dallas, PA 18612.

# NOTICE

NOTICE IS HEREBY GIVEN that Articles of Incorporation for: CURIOUS KIDS LEARNING CENTER E. MAIN STREET, INC. was filed with the Department of State of the Commonwealth of Pennsylvania pursuant to the provisions of the Pennsylvania Business Corporation Law of 1988 on November 5, 2021.

EUGENE C. KELLEY, ESQUIRE 259 S. Keyser Ave.

Feb. 18

# JURY TRIAL DEMANDED

Old Forge, PA 18518

IN THE COURT OF COMMON PLEAS OF LUZERNE COUNTY CIVIL ACTION—LAW

No. 2021-02547

JAMES CONNOLLY, III, 1855 Payne Street, Apt. 533, Dallas, TX 75201

Plaintiff

v.

PIERRE P. HONORE, JR., 3 Broad Street, Apt. 3, Beaver Meadows, PA 18216, DOWNS RACING, L.P. d/b/a MOHEGAN SUN AT POCONO DOWNS, 1280 Highway 315, Wilkes-Barre, PA 18702 and AMERIPARK, LLC, 233 Peachtree Street NE, Harris Tower—Suite 2600, Atlanta, GA 30303

**Defendants** 

#### NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within 20 days after this complaint and notice are served,

by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELE-PHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

#### AVISO

A USTED SE LE HA DEMAN-DADO EN LA CORTE. Si usted quiere defenderse contra la demanda expuesta en las siguientes páginas, tiene que tomar acción en un plazo de veinte (20) días después que reciba esta demanda y aviso, por presentar una notificación de comparecencia escrita personalmente o por un abogado y radicar por escrito en la Corte sus defensas u objeciones a las demandas presentadas en su contra. Se le advierte que si falla en hacerlo, el caso podría seguir adelante sin usted y un fallo podría ser dictado en su contra por la Corte sin previo aviso por cualquier dinero reclamado en la demanda o por cualquier otro reclamo o desagravio pedido por el/la demandante. Puede que usted pierda dinero o propiedad u otros derechos importantes para usted.

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INNIEDIATAMENTE. SI NO TIENE ABOGADO, DIBÍJASE O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ABAJO, ESTA OFI-CINA PUEDE BROVEERLE CON INFORMACION SOBRE COMO CONTRATAR UN ABOGADO, SI NO TIENE LOS FONDOS SUFI-CIENTES PARA CONTRATAR UN ABOGADO, ESTA OFICINA PO-DRÍA PROPORCIONARLE IN-FORMACIÓN ACERCA DE AGENCIAS QUE PUEDAN OF-RECERLES SERVICIOS LEGA-LES A PERSONAS QUE REÚNAN LOS REQEQUISITOS A UN HON-ORARIO REDUCIDO O GRATIS. North Penn Legal Services, Inc.

33 N. Main Street Pittston, PA 18640 (570) 299-4100

- or -

Pennsylvania Lawyer Referral Service

Luzerne County Bar Association Lawyer Referral Service 200 North River Street Wilkes-Barre, PA 18711 (570) 822-6029 MUNLEY LAW, P.C. Attorneys for Plaintiff 227 Penn Avenue Scranton, PA 18503 (570) 346-7401 (570) 346-3452 (fax)

Feb. 18

# JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF LUZERNE COUNTY CIVIL ACTION—LAW

No. 2020-CV-10039

THOMAS L. BRYINGTON and CHRISTINA BRYINGTON, his wife, 344 Roosevelt Drive, New Boston, PA 17948 Plaintiffs

v.

DARRICK B. MOODY,
59 Edgebrook, A59-1,
Buffalo, NY 14227,
CRETE CARRIER
CORPORATION d/b/a CRETE
CARRIER CORPORATION
SHAFFER TRUCKING,
400 NW 56th Street,
Lincoln, NE 68528
Defendants

#### NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within 20 days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You

are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELE-PHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

#### AVISO

A USTED SE LE HA DEMAN-DADO EN LA CORTE. Si usted quiere defenderse contra la demanda expuesta en las siguientes páginas, tiene que tomar acción en un plazo de veinte (20) días después que reciba esta demanda y aviso, por presentar una notificación de comparecencia escrita personalmente o por un abogado y radicar por escrito en la Corte sus defensas u objeciones a las demandas presentadas en su contra. Se le advierte que si falla en hacerlo, el caso podría seguir adelante sin usted v un fallo podría ser dictado en su contra por la Corte sin previo aviso por cualquier dinero reclamado en la demanda o por

cualquier otro reclamo o desagravìo pedido por el/la demandante. Puede que usted pierda dinero o propiedad u otros derechos importantes para usted.

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INNIEDIATAMENTE. SI NO TIENE ABOGADO. DIBÍJASE O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ABAJO, ESTA OFI-CINA PUEDE BROVEERLE CON INFORMACION SOBRE COMO CONTRATAR UN ABOGADO, SI NO TIENE LOS FONDOS SUFI-CIENTES PARA CONTRATAR UN ABOGADO, ESTA OFICINA PO-DRÍA PROPORCIONARLE IN-FORMACIÓN ACERCA DE AGENCIAS QUE PUEDAN OF-RECERLES SERVICIOS LEGA-LES A PERSONAS QUE REÚNAN LOS REQEQUISITOS A UN HON-ORARIO REDUCIDO O GRATIS. North Penn Legal Services, Inc.

33 N. Main Street Pittston, PA 18640 (570) 299-4100

- or -

Pennsylvania Lawyer Referral Service

Luzerne County Bar Association Lawyer Referral Service

200 North River Street Wilkes-Barre, PA 18711 (570) 822-6029 MUNLEY LAW, P.C.

Attorneys for Plaintiff The Forum Plaza

227 Penn Avenue Scranton, PA 18503 (570) 346-7401 (570) 346-3452 (fax)

Feb. 18



\* Dated Material. Do Not Delay. Please Deliver Before Tuesday, February 22, 2022